

**ATTACHMENT B – SECOND DECLARATION OF
ROSHNI C. AGARWAL**

**SECOND DECLARATION OF ROSHNI C. AGARWAL
PURSUANT TO 28 U.S.C. § 1746 AND FED. R. EVID. 1006**

I, Roshni C. Agarwal, declare as follows:

1. Unless otherwise stated, I have personal knowledge of the facts in this declaration, and if called as a witness, I could and would testify to the facts stated herein.

2. My name is Roshni C. Agarwal. I am a United States citizen over twenty-one years of age and am fully competent to give this Declaration.

3. I am a full time, salaried employee of the Federal Trade Commission (“FTC”) in Washington, D.C. My work address is 600 Pennsylvania Ave., N.W., Washington, D.C. 20580.

4. I am a Certified Public Accountant with the State of Texas and have a Bachelor of Business Administration degree and a Master in Professional Accounting degree from the University of Texas at Austin.

5. I have over 16 years of experience working as a forensic accountant and auditor for the federal government. Prior to starting at the FTC, I was a Forensic Accountant with the Department of State and a Senior Auditor with the Government Accountability Office.

6. Since I started at the FTC, I have worked as a Forensic Accountant in the Bureau of Consumer Protection (“BCP”) where I work with BCP trial attorneys and investigators.

7. In my capacity as a forensic accountant at the FTC, I reviewed International Markets Live, Inc. (“IML”) bank records, as well as bank records of companies related to IML and Christopher and Isis Terry. I reviewed bank records produced by First Security Bank of Nevada (“FSBN”) in response to a July 1, 2025 subpoena issued by the FTC to FSBN for documents related to the defendants. A listing of the bank accounts I reviewed, the owners or signers of the accounts, and the time periods covered by the records, appear in **Chart 1**:

Chart 1: FSNB Bank Accounts Included in Analysis

Entity	Account Owner(s)/Signer(s)	Last Four Digits of Account Number	First Statement Date	Last Statement Date
International Markets Live, Inc.	Isis de la Torre, Christopher Terry	8205	1/1/2024	6/30/2025
Assiduous, Inc.	Isis Terry	0798	1/1/2024	6/30/2025
Terra Firma Development, LLC	Christopher Terry, Isis Terry	8007	1/1/2024	6/30/2025
Royal Roma, LLC	Isis de la Torre	5912	1/1/2024	6/30/2025
Felicitous Charm, LLC	Isis de la Torre	7299	1/1/2024	6/30/2025

8. Below is a summary of the monthly deposits, withdrawals, and ending balances of the IML account ending in 8205 (“IML Account”):

X8205 - International Markets Live, Inc. (IML)			
	Deposits	Withdrawals	Ending Balance
Dec - 23			\$761,638.87
Jan - 24	\$ -	\$ 500,025.00	\$261,613.87
Feb - 24	\$ -	\$ 16,335.14	\$245,278.73
Mar - 24	\$ -	\$ -	\$245,278.73
Apr - 24	\$ -	\$ -	\$245,278.73
May - 24	\$ 450,000.00	\$ -	\$695,278.73
Jun - 24	\$ -	\$ 1,943.28	\$693,335.45
Jul - 24	\$ -	\$ -	\$693,335.45
Aug - 24	\$ -	\$ 400,025.00	\$293,310.45
Sep - 24	\$ -	\$ -	\$293,310.45
Oct - 24	\$ -	\$ -	\$293,310.45
Nov - 24	\$ -	\$ -	\$293,310.45
Dec - 24	\$1,667,570.57	\$1,024,862.96	\$936,018.06
Jan - 25	\$4,757,798.59	\$5,579,959.04	\$113,857.61
Feb - 25	\$3,746,815.14	\$3,821,195.37	\$39,477.38
Mar - 25	\$4,449,296.50	\$3,770,738.64	\$718,035.24
Apr - 25	\$3,695,776.46	\$4,197,175.09	\$216,636.61
May - 25	\$2,143,899.02	\$2,092,159.97	\$268,375.66
Jun - 25	\$364,050.34	\$569,712.16	\$62,713.84

Based on the IML Account statements, between December 2024 and June 2025 the IML Account received **\$20,825,206.62** in deposits. As of June 30, 2025, the IML Account held only **\$62,713.84**.

9. IML Account statements include various charges that appear to be personal expenses unrelated to the Defendants' business operations:

- a) **Private Jet Expenses:** Between January 15, 2025 to March 12, 2025, there were 5 transactions totaling **\$206,841.15** in payments to Vida Jets. According to its website, <https://vidajets.com/>, "Vida Jets truly offers an unrivaled and exceptional service, as well as a vast portfolio of charter options and an enticing range of worldwide destinations. Our first-rate Jet Specialists are able to devise a bespoke itinerary to ensure each charter experience surpasses even the highest expectation."

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- b) **Yacht Expenses:** Between February 19, 2025 to June 13, 2025, there were 5 transactions totaling **\$103,492.71** spent on “FLYHOPCO, LLC D/B/A BRADFORD MARINE.” According to its website, <https://bradford-marine.com/>, “Bradford Marine has grown into a full-service superyacht repair facility and marina with locations in Fort Lauderdale and Freeport, Grand Bahama.”
 - c) **Residential Expenses:** Between January 16, 2025 to June 2, 2025, there were 6 transactions totaling **\$24,589.68** spent on “HOA CHARGE ISIS TERRY.” These payments appear to be homeowner association fees for a residential property.
 - d) **Luxury Apparel Expenses:** On February 12, 2024 there was **\$2,031.48** spent at “Hermes Al Mana Dubai.” This appears to be a purchase of luxury apparel. On February 27, 2024 there was **\$13,479.64** spent at “Versace DXB AE.” This appears to be a purchase of luxury apparel.

17 10. The IML Account statements also include records of the following payment to companies
18 that are connected to Defendant Christopher Terry’s siblings.

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- a) Between January 3, 2025 to May 12, 2025 there were 10 transactions totaling **\$72,500** in payments to TNT Consulting Group Inc. I am informed that TNT Consulting Group Inc. is a New York corporation connected to Donald Terry, who I understand to be Defendant Christopher Terry’s brother.
 - b) Between January 3, 2025 to May 12, 2025 there were__ transactions totaling **\$72,500** in payments to Momentum 1 Consulting Inc. I am

1 informed that Momentum 1 Consulting Inc. is connected to Steve Terry,
2 who I understand to be Defendant Christopher Terry's brother.

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4 11. Based on my review of the account statements of the Assiduous, Inc. account ending in
5 0798 ("Assiduous Account"):

- 6 a) as of June 30, 2025, the Assiduous Account held only \$3,037.59;
7 b) on April 7, 2025, \$100,000 was transferred from the Assiduous Account to
8 the IML Account; and
9 c) on June 27, 2025, \$14,000 was transferred from the Assiduous Account to
10 the IML Account.

11 12. Based on my review of the account statements of the Terra Firma Development, LLC
12 account ending in 8007 ("Terra Firma Development Account"):

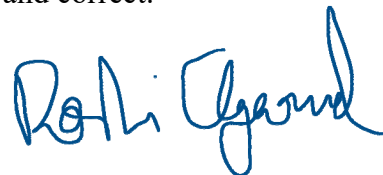
- 13 a) On October 1, 2024, the Terra Firma Development Account held
14 \$3,978,000;
15 b) As of June 30, 2025, the Terra Firma Development Account held
16 \$85,495.93

17 13. Based on my review of the account statements of Royal Roma, LLC's account ending in
18 5912, as of June 30, 2025, the account held \$121,771.06.

19 14. Based on my review of the account statements of Felicitous Charm, LLC's account
20 ending in 7299, as of June 30, 2025, the account held \$30,865.34.
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23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on August 5, 2025, in Virginia.

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27 Roshni C. Agarwal
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